

COUNTY OF SUFFOLK



EDWARD P. ROMAINÉ  
SUFFOLK COUNTY EXECUTIVE

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DEPARTMENT OF LAW

*Via ECF*

June 2, 2025

Hon. Gary R. Brown  
United States District Judge  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

Re: *McGregor v. Suffolk County, et al.*, 23-cv-1130 (GRB)(ARL)

Dear Judge Brown:

On May 29, 2025, Defendants County of Suffolk, Suffolk County Police Commissioner Rodney Harrison, and Suffolk County Police Lieutenant Michael Komorowski (collectively “County Defendants”) filed, as a bundle motion, their cross-motion for summary judgment as Docket Entry (“DE”) No. 101; it was comprised of DE Nos. 101-1 through DE 101-23. Previously, Plaintiffs had filed, as a bundle motion, their motion for summary judgment as DE Nos. 91, 92, 93, 98, and 99.<sup>1</sup>

In compiling hard copies of DE No. 101 for provision as a courtesy copy to the Court, the County Defendants became aware that they had failed to file an exhibit in support of Plaintiffs’ opposition to the County Defendants’ summary judgment motion, the exhibit in question being the Declaration of Edward Newman, dated April 28, 2024 (“the Newman Declaration”). Plaintiffs had previously efiled the Newman Declaration with the Court as DE No. 91-17 in support of their motion for summary judgment.

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<sup>1</sup> Plaintiff’s bundle-filing consisted of the following: DE No. 91 (Plaintiffs’ summary judgment motion), DE No. 92 (the State Intervenor’s Opposition thereto), DE No. 93 (Plaintiff’s Reply to the State Intervenor’s Opposition), DE 98 (the County’s Opposition to the Plaintiff’s summary judgment motion), and DE No. DE 99 (Plaintiffs’ reply to the County Defendants’ opposition).

As discussed in a phone conversation with the Court's law clerk, the County Defendants, rather than refile and reprinting their summary judgment motion, are by this letter notifying the Court about their failure to file the Newman Declaration, which can be readily accessed electronically at DE 91-17. In addition, the County Defendants will include DE 91-17 in the courtesy copy of their summary with an explanation that the Newman Declaration should, in addition to being efiled in DE 91, have been efiled as part of DE 101.

The County Defendants thank the Court for its consideration and courtesies.

Very truly yours,

Christopher J. Clayton  
Suffolk County Attorney

/s/ Anne C. Leahey  
By: Anne C. Leahey  
Assistant County Attorney